

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SHARKNINJA'S MOTION TO ENJOIN DUPLICATIVE LITIGATION

Plaintiff SharkNinja Operating LLC (“SharkNinja”) respectfully moves for the entry of an order enjoining defendant iRobot Corporation from prosecuting a later-filed, parallel litigation in the U.S. District Court for the District of Massachusetts, Civ. No. 19-cv-12125-ADB. The grounds for this motion are set forth in SharkNinja’s Opening Brief, submitted herewith.

A form of Order is attached hereto.

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/s/ Jack B. Blumenfeld

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October 18, 2019

RULE 7.1.1 CERTIFICATE

Pursuant to Local Rule 7.1.1, I hereby certify that counsel for SharkNinja have conferred with counsel for iRobot Corporation in an effort to resolve the issues presented by this motion. The parties were unable to reach agreement on those issues.

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)

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FOR THE DISTRICT OF DELAWARE

[PROPOSED] ORDER

Having considered Plaintiff's motion to enjoin Defendant iRobot Corporation ("iRobot") from prosecuting a later-filed action in the District of Massachusetts, together with iRobot's opposition thereto, and all supporting briefing and papers, IT IS HEREBY ORDERED, this

____ day of _____, 2019, that:

1. The motion is GRANTED;
2. iRobot, together with all officers, agents, servants, employees, attorneys, and all other persons who are in active concert or participation with the foregoing, shall not undertake any further activity to prosecute the civil action captioned *iRobot Corporation v. SharkNinja Operating LLC, et al.*, Civ. No. 19-cv-12125-ADB, currently pending in the United States District Court for the District of Massachusetts.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 18, 2019, upon the following in the manner indicated:

Gregg F. LoCascio Esquire
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Attorneys for Defendant

VIA ELECTRONIC MAIL

/s/ Jack B. Blumenfeld

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